

EXHIBIT 5

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UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF WYOMING

Case No. 2:23-cv-00118-NDF

STEPHANIE WADSWORTH, Individually and as
Parent and Legal Guardian of W.W., K.W, G.W,
and L.W., minor children, and MATTHEW WADSWORTH,

Plaintiffs,

vs.

WALMART, INC. and JETSON ELECTRIC BIKES, LLC,

Defendants.

VIDEO DEPOSITION OF BRIAN N. STRANDJORD, PE, CFI, CFEI
November 27, 2024

APPEARANCES:

ON BEHALF OF THE PLAINTIFFS:

T. MICHAEL MORGAN, ESQ.
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(Via Zoom)

ON BEHALF OF THE DEFENDANTS:

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Also Present: Julie Butcher, Videographer
Peter Curran, Concierge-Tech (Via Zoom)
Angela Kelsey-Flowers (Via Zoom)

1 MR. MORGAN: If we can pull up the report
2 again, Exhibit A, and go back to the conclusions,
3 please.

4 MR. CURRAN: Yes, sir. One moment.
5 It's up, sir.

6 MR. MORGAN: Okay.

7 Q (By Mr. Morgan) When we look at Conclusion
8 No. 4, the conclusion reads, "The physical evidence
9 presented by the electrical system at the Residence
10 was not consistent with a fire originating within the
11 Residence."

12 When we talk about the physical evidence
13 presented by the electrical system, are you referring
14 to arcing?

15 A Yes. I'm referring to electrical arcing or
16 the lack thereof.

17 Q Okay. And is it a fair interpretation of
18 this statement that it is not saying conclusively the
19 fire did not originate in the residence; it is simply
20 saying there was no evidence of electrical arcing in
21 Bedroom 4?

22 A Part of what -- part of what Conclusion 4
23 is saying is that there's no evidence of electrical
24 arcing in Bedroom 4, but it goes -- it goes further
25 than that.

1 The arc mapping as a whole provides in this
2 case an indication of the fire spread or how the fire
3 progressed through the course of the fire.

4 Q Okay. Explain.

5 A Sure. So when we look at the -- the
6 area -- potential areas of origin defined by the fire
7 investigators involved in this matter -- so we looked
8 at the Bedroom 4 and we looked at the area just
9 outside of Bedroom 4, where a polymer smoking shed was
10 located.

11 If we look at the -- all of the conductors
12 that we looked at, we found no evidence of electrical
13 arcing in the branch circuit conductors in Bedroom 4;
14 we found evidence of electrical arcing on small
15 fragments of wires located in what was the polymer
16 shed. Whether that was the ends of extension cords or
17 appliance cords plugs into that, we don't know. They
18 were simply fragments. But we have evidence of
19 electrical arcing in the shed.

20 And then we have the severed service
21 triplex that provided electrical service to the
22 residence from the -- from the utility company.

23 And so we have -- we have arc -- once --
24 I'll start with the service triplex. The service
25 triplex was composed of aluminum, and it ran

1 approximately right over the polymer shed.

2 The service triplex was melted and severed
3 during the fire, which is not uncommon. Again,
4 aluminum has a low enough melting temperature that it
5 is common for aluminum to melt in a fire.

6 Once that service triplex melted and was
7 severed, there would no longer be any electrical
8 service to the residence; there would no longer be any
9 electrical energy in any of the branch circuits in the
10 residence.

11 So having evidence of electrical arcing on
12 cords in the shed, we know that fire was present in
13 the shed or at the shed prior to the time that the
14 service triplex was severed; because again, after the
15 service triplex was severed, we would have no
16 electricity to produce arcing.

17 Then the --

18 Q Okay.

19 A -- the -- once that service triplex was
20 severed, there is no longer -- again, no longer any
21 electrical energy present in any of the branch
22 circuits; so there would be no -- there would be no
23 electrical arcing, there would be no evidence of
24 electrical arcing on any of the other circuits after
25 that.

1 Q So when you say that you believe that
2 because the triplex was melted and you didn't see
3 arcing in Bedroom 4, that means there was no
4 electricity to the home, right?

5 A (No response.)

6 Q Is that right?

7 A I want to make sure I understand exactly
8 what you're stating there.

9 Yes, once the service triplex was melted
10 and severed, there was no more electrical power to the
11 home.

12 Q Right. But what I'm saying is: Because
13 you only arc mapped two places, Bedroom 4 and the
14 shed, you cannot tell anyone that there was not
15 electricity in the home at the time that the service
16 triplex melted, because you don't have any evidence
17 yourself, right?

18 MR. LaFLAMME: Object to form.

19 A So if I understand what you just asked me,
20 you're saying -- you're saying that I cannot determine
21 that there was no electrical power in the home when
22 the service triplex melted. And that is incorrect.

23 Q (By Mr. Morgan) Correct.

24 A When the service triplex melted, there was
25 no longer any electrical energy in the home.

1 Q (By Mr. Morgan) Okay. No. 3 says -- we'll
2 take it in two parts -- The physical evidence
3 presented by the electrical system at the Residence
4 was consistent with: A, Fire being present at or
5 within the polymer Smoking Shed prior to the time that
6 the fire severed the overhead service triplex to the
7 Residence.

8 So let's start just with that. The
9 evidence that that is based off is the arcing found on
10 the metal fragments within the shed, correct?

11 A Yes, on the conductor fragments in the
12 shed.

13 Q As well as the lack of arcing in Bedroom 4,
14 correct?

15 A Well, when we're -- when we're speaking
16 specifically about Conclusion 3a, when I say fire
17 being present at or within the polymer smoking shed
18 prior to the time that the fire severed the overhead
19 service triplex to the residence, I'm not -- I'm not
20 making that statement based on anything that was or
21 was not found in Bedroom 4.

22 I'm making that statement simply based on
23 the fact that the service triplex was severed; and
24 after the time that that service triplex was severed,
25 there was no longer any electrical energy supplied to

1 the residence.

2 Therefore, any electrical arcing that
3 occurred to those conductors in the shed, which was
4 plugged into extension cords, powered by the
5 residence, for there to be evidence of electrical
6 arcing in the shed, that had to have happened prior to
7 the time that the service triplex was severed.

8 Q Okay. I do -- I believe I understand. But
9 let me ask you a hypothetical: Hypothetically, if we
10 had a fire in Bedroom 4, coming out of the window,
11 could that also cause the aluminum to melt and
12 disconnect power from the home?

13 A Any fire present at the service triplex
14 could cause the aluminum to melt and severe the
15 service to the residence.

16 Q Okay. And so going specifically to A:
17 What we are basing the fact that the fire must have
18 come from the shed is that we have the presence of
19 arcing on the wire fragments and we do not have the
20 presence of arcing in Bedroom 4?

21 A No. That's not what I'm stating in 3a.
22 What I'm stating -- what I'm stat- --

23 Q Okay. I'm still lost.

24 A I'm sorry. Go ahead.

25 Q Go ahead.

1 No, I'm still -- I'm just having trouble
2 figuring out what other elements are considered there,
3 so I want to -- I'm trying to understand it. I'm
4 sorry.

5 A Sure. Sure. Conclusion 3a is very simple:
6 There was evidence of arcing, electrical arcing, on
7 conductor fragments in the shed. That could only
8 occur if there was electrical energy present, if the
9 electrical service to the residence was still intact.
10 The service triplex to the residence, which
11 supplies all of the electrical power to the residence,
12 was severed during the fire. It was melted and
13 severed.

14 After the time that that service triplex
15 was severed, there was no longer any electrical energy
16 in the building and there was no possibility of
17 electrical arcing on conductors powered by the
18 building.

19 So all I'm saying in Conclusion 3a is that
20 the arcing occurred on the conductors within the shed
21 prior to the time that the overhead service triplex
22 was severed.

23 Q How do you determine that there was not
24 fire inside the residence and fire in the shed at the
25 same time?

1 time that the fire attacked the branch circuit wiring
2 within Bedroom 4 of the Residence.

3 And is that saying that because there was
4 no arcing within Bedroom 4, that you believe the power
5 must have been cut by that time?

6 A That is correct.

7 Q Got it.

8 Now, are you aware of a hypothesis or
9 research relating to arcing on non-energized lines?

10 A I'm not aware -- I'm not aware of any
11 arcing occurring on non-energized lines, because
12 electrical arcing requires that the lines be
13 energized.

14 Q Okay. And then let's go to Conclusion 1.
15 And I'm going to leave out a word just for future
16 motion in limine, but we can talk about whether it
17 should come back in later.

18 No. 1: Evidence of electrical arcing was
19 present on conductors located within the polymer Shed
20 adjacent to the Residence.

21 That conclusion is simply talking about the
22 arcing on the metal fragments that we've seen,
23 correct, or that we've spoken about?

24 A Yes. That is -- that is speaking about
25 evidence of electrical arcing on the conductor

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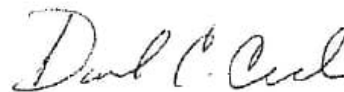
I, David Corbin, a Notary Public in and for the State of Maryland, do hereby certify that the within named, SAMUEL SUDLER, III, personally appeared before me at the time and place herein set according to law, was interrogated by counsel.

I further certify that the examination was recorded stenographically by me and then transcribed from my stenographic notes to the within printed matter by means of computer-assisted transcription in a true and accurate manner.

I further certify that the stipulations contained herein were entered into by counsel in my presence.

I further certify that I am not of counsel to any of the parties, not an employee of counsel, nor related to any of the parties, nor in any way interested in the outcome of this action.

AS WITNESS my hand and Notarial Seal this 4th day of December, 2024, at Centerville, Maryland.



David C. Corbin
Notary Public

My commission expires November 13, 2027